

**United States District Court
Southern District of Texas
Victoria Division**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY,
et al.,

Defendants.

Case 6:23-cv-00007

**PLAINTIFF STATES' OBJECTIONS TO INTERVENOR DEFENDANTS'
WITNESS AND EXHIBIT LIST**

Plaintiff States file the following evidentiary objections to Intervenor Defendants' Witness and Exhibit List, ECF No. 207:

EXHIBIT NUMBER	DESCRIPTION	Offer	Object	Date Admit	Date N/Adm
1	Supplemental Expert Declaration of Leighton Ku, Ph.D., MPH, August 2, 2023		FRE 402, 802		
2	Maria Montes & Savarni Sanka, <i>In Nicaragua, Crackdown on Religious Actors Further Imperils Return to Democracy</i> , U.S. Inst. Peace (Oct. 7, 2022)		FRE 402, 802		
3	<i>World Report 2022: Nicaragua</i> , Hum. Rts. Watch		FRE 402, 802		
4	<i>World Report 2022: Venezuela</i> , Hum. Rts. Watch		FRE 402, 802		
5	<i>WFP Venezuela Food Security Assessment Main Findings Data Collected between July and September 2019</i> , World Food Programme (Feb. 23, 2020)		FRE 402, 802		
6	Excerpt from Immigration and Nationality Act, Pub. L. No. 82-414, 66 Stat. 163 (1952).				

7	Excerpt from S. Comm. on the Judiciary, 96th Cong., <i>Review of U.S. Refugee Resettlement Programs and Policies</i> 9 (Comm. Print 1980).				
8	Excerpt from Refugee Act of 1980, Pub. L. No. 96-212, 94 Stat. 102 (1980).				
9	Excerpt from H.R. Rep. No. 96-781 (1980) (Conf. Rep.).				
10	Excerpt from Immigration Reform and Immigrant Responsibility Act, Pub. L. No. 104-208, Division C, 110 Stat. 3009-546 (1996).				
11	Excerpts from H. R. Rep. No. 104-469, pt. 1 (1995).				
12	Immigr. and Naturalization Serv., <i>INS Focus: What is Immigration Parole?</i> (1994).				
13	United States General Accounting Office (GAO), <i>Cuba: U.S. Response to the 1994 Cuban Migration Crisis</i> , (September 1995).				
14	Excerpt from National Defense Authorization for Fiscal Year 2020, Pub. L. No. 116-92, 133 Stat. 1198 (2019)				
15	Excerpt from Extending Government Funding and Delivering Emergency Assistance Act, Pub. L. No.				

	117-43, Div. C., 135 Stat. 344 (Sept. 30, 2021)				
16	Additional Ukraine Supplemental Appropriations Act, Pub. L. No. 117-128, 136 Stat. 1211 (May 21, 2022)				
17	Excerpt from Dep't of Justice, Immigration and Naturalization Serv., <i>Annual Report of the Immigration and Naturalization Serv.</i> (1957)				
18	Hungarian Refugees Relief Act, Pub. L. No. 85-559, § 2, 72 Stat. 419 (1958)				
19	The Cuban Adjustment Act, Pub. L. No. 89-732, §§ 1-2, 80 Stat. 1161 (1966)				
20	The Indochina Migration and Refugee Assistance Act of 1975, Pub. L. No. 94-23, §§ 1-2, 89 Stat. 87 (1975)				
21	Mirta Ojito, <i>The Long Voyage from Mariel Ends</i> , The New York Times (Jan. 16, 2005)		FRE 402, 802		
22	U.S. Dep't of State, <i>Cuban Haitian Arrivals in the U.S.</i> (1980)				
23	Ruth Ellen Wasem, <i>U.S. Immigration Policy on Haitian Migrants</i> , CRS Report for Congress 1 (last updated Jan. 22, 2007)				
24	The Refugee Education Assistance Act of 1980, Pub. L. No. 96-422, 94 Stat. 1799 (1980)				
25	Ruth Marcus, <i>U.S. Moves to Ease Soviet Emigres' Way</i> , The Washington Post (Dec. 9, 1988)		FRE 402, 802		
26	Excerpt from Foreign Operations, Export Financing, and Related Programs Appropriations Act, Pub. L.				

	No. 101-167, § 599E, 103 Stat. 1195 (1989)				
27	United States General Accounting Office (GAO), <i>Refugee Program: The Orderly Departure Program from Vietnam</i> (April 1990)		FRE 402		
28	Dep't of Homeland Sec., <i>Statement by Secretary Johnson on the Continued Normalization of our Migration Relationship with Cuba</i> (Jan. 12, 2017)				
29	Michael H. Erisman, <i>Brain Drain Politics: The Cuban Medical Professional Parole Programme</i> , Int'l J. of Cuban Studies, Vol. 4, No. 3/4, 2012, at 269–90		FRE 402, 802		
30	Cuban Family Reunification Parole Program, 72 Fed. Reg. 65588 (Nov. 21, 2007)				
31	U.S. Customs and Border Protection, <i>Important Update in Entry Requirements: Parole for Citizens of the Russian Federation and the People's Republic of China for the CNMI Only</i> (Nov. 16, 2009)				
32	Special Representatives of the United States and the Commonwealth of the Northern Mariana Islands, <i>Report to the President on 902 Consultations Related to the DHS Discretionary Parole Program</i> (2019)				
33	U.S. Customs and Border Protection, <i>Russian Citizens Now Eligible to Travel to Guam Visa-Free</i> (Jan. 26, 2012)				

34	Excerpt from International Entrepreneur Rule, 81 Fed. Reg. 60130 (August 31, 2016)			
35	U.S. Citizenship and Immigr. Servs., <i>Policy Memorandum: Parole of Spouses, Children and Parents of Active Duty Members of the U.S. Armed Forces, the Selected Reserve of the Ready Reserve, and Former Members of the U.S. Armed Forces or Selected Reserve of the Ready Reserve and the Effect of Parole on Inadmissibility under Immigration and Nationality Act § 212(a)(6)(A)(i)</i> , PM-602- 0091 (Nov. 15, 2013)			
36	Franco Ordoñez, <i>Trump Wants To Withdraw Deportation Protections For Families of Active Troops</i> , NPR (June 27, 2019)		FRE 402, 802	
37	Excerpt from National Defense Authorization Act for Fiscal Year 2020, Pub. L. No. 116-92, § 1758, 133 Stat. 1198(2020)			
38	U.S. Citizenship and Immigr. Servs., <i>Central American Minors (CAM) Program</i> (June 23, 2023)			
39	Dep't of Homeland Sec., <i>Operation Allies Welcome</i> (May 8, 2023)			
40	Excerpt from Extending Government Funding and Delivering Emergency Assistance Act, Pub. L. No. 117-43, 135 Stat. 344 (Sept. 30, 2021)			
41	Dep't of Homeland Sec., <i>Operation Allies Welcome Afghan Parolee and Benefits Report</i> (2023)			

42	Additional Ukraine Supplemental Appropriations Act, Pub. L. No. 117-128, 136 Stat. 1211 (2022)				
43	U.S. Citizenship and Immigr. Servs., <i>DHS To Implement Haitian Family Reunification Parole Program</i> (October 17, 2014)				
44	The White House, <i>Los Angeles Declaration on Migration and Protection</i> (June 10, 2022)				
45	U.S. Customs and Border Protection Encounters: Nationwide, All Nationalities, FY 2021				
46	U.S. Customs and Border Protection Encounters: Nationwide, All Nationalities, FY 2022				
47	U.S. Customs and Border Protection Encounters: Nationwide, All Nationalities, FY 2023				
48	U.S. Customs and Border Protection Encounters: Southwest Border, All Nationalities, FY 2021				
49	U.S. Customs and Border Protection Encounters: Southwest Border, All Nationalities, FY 2022				
50	U.S. Customs and Border Protection Encounters: Southwest Border, All Nationalities, FY 2023				
51	U.S. Customs and Border Protection Encounters: Southwest Border, Cuban/Haitian/Nicaraguan/Venezuelan Nationals, FY 2021				
52	U.S. Customs and Border Protection Encounters: Southwest Border,				

	Cuban/Haitian/Nicaraguan/Venezuelan Nationals, FY 2022			
53	U.S. Customs and Border Protection Encounters: Southwest Border, Cuban/Haitian/Nicaraguan/Venezuelan Nationals, FY 2023			
54	U.S. Customs and Border Protection Encounters: Southwest Border, Cuban/Haitian/Nicaraguan Nationals, FY 2022			
55	U.S. Customs and Border Protection Encounters: Southwest Border, Cuban/Haitian/Nicaraguan Nationals, FY 2023			
56	U.S. Customs and Border Protection Encounters: Southwest Border, Ukrainian Nationals, FY 2022			
57	U.S. Customs and Border Protection Encounters: Southwest Border, Ukrainian Nationals, FY 2023			
58	U.S. Customs and Border Protection Encounters: Southwest Border, Venezuelan Nationals, FY 2022			
59	U.S. Customs and Border Protection Encounters: Southwest Border, Venezuelan Nationals, FY 2023			
60	Raquel Torres, <i>Migrant Aid Groups Stretched Thin as City Officials Seek Federal Help for Expected Wave</i> , San Antonio Report (Apr. 27, 2022)		FRE 402, 802	
61	Uriel J. Garcia, <i>El Paso Scrambles to Move Migrants Off the Streets and Gives Them Free Bus Rides as Shelters Reach Capacity</i> , The Texas Tribune (Sep. 22, 2022)		FRE 402, 802	

62	Denelle Confair, <i>Local Migrant Shelter Reaching Max Capacity as it Receives Hundreds per Day</i> , KGUN9 Tucson (Sep. 22, 2022)		FRE 402, 802		
63	U.S. Bureau of Justice Assistance, FY21 State Criminal Alien Assistance Program (SCAAP) Award Information for Texas Department of Criminal Justice		FRE 402		
64	Kristie Wilder, <i>Texas Joins California as State with 30-Million-Plus Population</i> , U.S. Census Bureau (Mar. 30, 2023)		FRE 402		
65	Jon Lee Anderson, <i>Haiti Held Hostage</i> , New Yorker (July 17, 2023)		FRE 402, 802		

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CERTIFICATE OF SERVICE

I certify that on August 4, 2023, I filed this motion through the Court's CM/ECF system, which served it on all counsel of record.

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